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April 30, 2019

VIA ECF

Honorable Lois H. Goodman, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 East State Street, Room 7050
Trenton, New Jersey 08608

Re: *In Re Effexor XR Antitrust Litigation*
Civil Action No.: 3:11-cv-5479 (PGS/LHG) (Lead)

Dear Judge Goodman:

I write regarding Plaintiffs' Motion to Compel Zydus Pharmaceuticals U.S.A. and Cadila Healthcare Limited (together, "Zydus") to Produce Documents (ECF No. 581) in the above-referenced action, which was docketed and served on Zydus's counsel, Steven Moore, Esq., on March 27, 2019.

Under Local Civil Rule 7.1(d)(2), any opposition to this motion was due no later than April 22, 2019, fourteen days prior to the applicable motion day of May 6.

While there has been meet and confer communications, including written communications between counsel regarding Zydus's production since the filing of the motion, none of the issues which are the subject of the motion have been resolved, and Zydus has not filed any opposition to this Motion, nor has it requested an extension to do so.

Respectfully yours,

/s/ Peter S. Pearlman

Peter S. Pearlman

PSP:mds

cc: Steven Moore, Esq. (Via E-Mail Steven.Moore@withersworldwide.com)
All Counsel of Record (Via ECF)